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DISTRICT OF ARIZONA	
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6 *In propria persona.*

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 8 UNITED STATES DISTRICT COURT
 9 FOR THE DISTRICT OF ARIZONA
 10 PHOENIX DIVISION

11 Jason Crews,

12 Case No.: 2:25-cv-00572-PHX-SPL

13 Plaintiff,

14 vs.
 15 The Allstate Corporation,
 16 Defendant.

17 Plaintiff's *Ex Parte* Motion for
 Reconsideration of this Court's Order
 Denying Plaintiff's Request for Permission
 to Electronically File Documents (Doc. 8)

18 DEMAND FOR JURY TRIAL

19 Plaintiff Jason Crews, proceeding pro se, pursuant to Local Rules of Civil Procedure
 20 ("L.R. Civ") 7.2(g) respectfully moves this Court to reconsider its Order dated February 24,
 21 2025 (Doc. 8) denying Plaintiff's Motion to Allow Electronic Filing. This Motion for
 22 Reconsideration is based on the following grounds:
 23

24 **MEMORANDUM OF POINTS AND AUTHORITIES**

25 **I. INTRODUCTION**

26 Plaintiff respectfully requests that this Court reconsider its denial of Plaintiff's Motion
 27 to Allow Electronic Filing. As detailed below, Plaintiff has experience with electronic filing
 28 in federal courts, has demonstrated competence in the vast majority of his electronic filings,
 and would face significant obstacles in pursuing this case without electronic filing access.

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 TO FEDERAL AND/OR LOCAL RULES AND PRACTICES
 AND IS SUBJECT TO REJECTION BY THE COURT.

REFERENCE 54

(Rule Number/Section)

1 **II. ARGUMENT**

2 **A. Plaintiff Has Demonstrated Competence with Electronic Filing Systems**

3 While Plaintiff acknowledges that he is not a trained attorney, he has experience with
4 electronic filing in federal courts. Plaintiff has been granted permission to electronically file
5 in thirty-three (33) different federal cases within the District of Arizona, one in each of the
6 Eastern District of New York and Northern District of Illinois. To the best of his
7 knowledge in this extensive history of electronic filing, Plaintiff has only made electronic
8 filing errors in one instance.

9 Specifically, in this instance, Plaintiff erroneously filed summons documents
10 alongside a first amended complaint in a single docket entry, rather than submitting the
11 summons as separate docket entries under "Summons Submitted". This minor technical
12 error has not resulted in any substantive problems for the courts in question, was
13 immediately resolved once brought to Plaintiff's attention, and Plaintiff has now identified
14 this issue and commits to avoiding this error in the future.

15 Plaintiff has diligently reviewed the "District of Arizona's ECF Administrative
16 Policies and Procedures Manual," the "Local Rules of Practice for the District of Arizona,"
17 and the Court's "General Orders" to ensure compliance with all applicable requirements.
18 Despite these efforts, Plaintiff was unable to locate specific instructions regarding the proper
19 docketing of summons documents. Nevertheless, Plaintiff is committed to learning from this
20 experience and to ensuring proper electronic filing practices.

21 **B. Lack of Electronic Filing Access Creates Substantial Obstacles to Justice**

22 The inability to file electronically creates significant practical challenges for Plaintiff
23 that may substantially impede his access to justice. This is particularly concerning in
24 Telephone Consumer Protection Act (TCPA) cases like this one, where the statutory
25 damages are often insufficient to attract attorney representation, making pro se litigation the
26 only viable path to pursue legal remedies.

27 Although Plaintiff is not a trained attorney, he strives to follow all applicable rules and to
28 produce filings of the highest possible quality. This process is challenging and time-

1 consuming, frequently requiring Plaintiff to utilize the full time allotted for drafting, editing,
2 and filing the required documents. Without electronic filing access, Plaintiff will be forced to
3 choose between:

- 4 1. Reducing the quality of his filings to accommodate mail delivery timeframes;
- 5 2. Regularly requesting extensions from the Court, which will themselves be delayed
6 through mail filings; or
- 7 3. Risking missed deadlines due to mail delivery delays outside of Plaintiff's control.

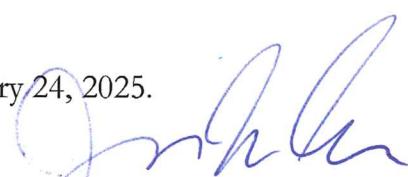
8 These obstacles create an undue burden on Plaintiff's ability to effectively pursue his case
9 and may ultimately impede his access to justice.

10 **III. CONCLUSION**

11 For the foregoing reasons, Plaintiff respectfully requests that this Court reconsider its
12 Order denying electronic filing access. Plaintiff has demonstrated substantial competence in
13 electronic filing across numerous federal cases, has identified and committed to resolving the
14 minor technical errors previously made, and would face significant obstacles in pursuing this
15 case without electronic filing access.

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17 RESPECTFULLY SUBMITTED on this February 24, 2025.



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19 Jason Crews
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